

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

BELCALIS MARLENIS ALMÁNZAR,

Plaintiff,

v.

LATASHA TRANSRINA KEBE a/k/a
LATASHA TRANSRINA HOWARD and
KEBE STUDIOS LLC,

Defendants.

Case No. 1:19-cv-01301-WMR

CONSENT MOTION FOR EXTENSION OF TIME

Plaintiff Belcalis Marlenis Almánzar (“Plaintiff”) respectfully submits this consent motion for an extension of the deadlines to respond to the pending motions filed by Defendant Latasha Transrina Kebe (“Kebe”), and provides as follows:

1. On December 15, 2020, Kebe filed a motion to dismiss Defendant Kebe Studios LLC (ECF No. 80).
2. The current deadline to respond to the motion to dismiss is Tuesday, December 29, 2020.
3. On December 21, 2020, Kebe filed a motion to compel responses to interrogatories (ECF No. 82) and a motion to compel the production of documents (ECF No. 84).

4. The current deadline to respond to both motions to compel is Monday, January 4, 2020.

5. All together, the briefs filed by Kebe in support of these motions consist of sixty-one (61) pages.

6. Both law firms representing Plaintiff in this matter are closed on Friday and through next week for the holidays and thus are understaffed.

7. In light of the intervening holidays and the sheer volume of briefing that needs to be responded to in connection with these pending motions, Plaintiff respectfully requests an extension of the response deadlines to Friday, January 15, 2020.

8. The Court has scheduled oral argument on these motions for February 3, 2020, and therefore, the requested extension will not delay the resolution of these motions.

9. Kebe's counsel has consented to the requested extension.

Dated: December 22, 2020

Respectfully submitted,

/s/ W. Andrew Pequignot

Lisa F. Moore (Bar No. 419633)

W. Andrew Pequignot (Bar No. 424546)

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CERTIFICATION AS TO FONT

In accordance with Local Rule 7.1(D), the undersigned certifies that the foregoing document was prepared with Times New Roman 14, a font and point selection approved by the Court in Local Rule 5.1(C).

DATED: December 22, 2020

/s/ W. Andrew Pequignot _____
W. Andrew Pequignot

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CERTIFICATE OF SERVICE

I hereby certify that on December 22, 2020, I electronically filed the foregoing CONSENT MOTION FOR EXTENSION OF TIME with the Clerk of the Court using the CM/ECF system, which will automatically send email notification of such filing to all of the attorneys of record

/s/ W. Andrew Pequignot
W. Andrew Pequignot